

1 THE HONORABLE JAMES L. ROBART
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

9 PROMEDEV LLC dba RELIEF FACTOR
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Plaintiff,

v.

12 ROBY WILSON (individual) and
13 MAXXIMEDIA ADVERTISING CO; and
14 DOES 1 through 25.

Defendants.

No. 2:22-cv-01063-JLR JLR

**STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME TO
RESPOND TO DEFENDANTS'
COUNTERCLAIMS**

**NOTE ON MOTION CALENDAR:
NOVEMBER 10, 2022**

15 Plaintiff Promedev LLC dba Relief Factor (“Plaintiff” or “Promedev”), and Defendants
16 Roby Wilson and Maxximedia Advertising Co. (collectively “Defendants”), by and through their
17 attorneys, stipulate to an extension of time for Promedev to respond to the counterclaims in
18 Defendants’ Answer to Complaint, Affirmative Defenses and Counterclaim (the
19 “Counterclaims”) (Dkt. # 18).

20 On October 25, 2022, Defendants filed their Counterclaims. Under Rule 12(a)(1)(B),
21 Promedev’s response to the Counterclaims is due on November 15, 2022. Because this deadline
22 coincides with other important deadlines in this matter, including exchanging initial disclosures
23 and filing their joint status report, and the approaching holidays the parties conferred and agreed
24 that, subject to the Court’s approval, Promedev can have until December 6, 2022 to respond to
25 the Counterclaims and agreed to an alternative briefing schedule as set forth below.
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STIPULATED MOTION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COUNTERCLAIMS - 1
CASE NO. 2:22-CV-01063-JLR

1 Accordingly, subject to the Court's approval, Promedev and Defendants stipulate to the
2 following briefing schedule:
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4 Event	5 Current Deadline	6 Proposed Deadline
Promedev's answer to Plaintiff's Counterclaims or motion to dismiss	November 15, 2022	December 6, 2022
Defendants' opposition to Promedev's motion to dismiss (if any)	December 5, 2022	December 23, 2022
Promedev's reply in support of its motion to dismiss (if any)	December 9, 2022	January 6, 2023

10 IT IS SO STIPULATED.
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12 Respectfully submitted this 10th day of November, 2022.
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STIPULATED MOTION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
COUNTERCLAIMS - 2
CASE NO. 2:22-CV-01063-JLR

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Wilson

[PROPOSED] ORDER

The Court hereby grants the Parties' Stipulated Motion for Extension of Time to Respond to Defendants' Counterclaims and orders the following briefing schedule:

Event	Current Deadline	Proposed Deadline
Promedev's answer to Plaintiff's Counterclaims or motion to dismiss	November 15, 2022	December 6, 2022
Defendants' opposition to Promedev's motion to dismiss (if any)	December 5, 2022	December 23, 2022
Promedev's reply in support of its motion to dismiss (if any)	December 9, 2022	January 6, 2023

IT IS SO ORDERED on this 10th day of November, 2022.



The Honorable James L. Robart
United States District Judge